



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Chief Engineer and General Manager

July 13, 2009

DOCKET

09-AFC-1

DATE JUL 13 2009

RECD AUG 25 2009

Mr. Eric Knight
Energy Facilities Siting and Docket Office
California Energy Commission
1516 Ninth Street
Sacramento, California 95814-5512

To whom it may concern,

The County Sanitation Districts of Los Angeles County (Sanitation Districts) have reviewed the request for agency participation for the review of the Watson Cogeneration and Electric Reliability Project (09-AFC-1) and provides the following requested response:

Question 1:

A discussion of those aspects of the proposed site and related facilities for which your agency would have jurisdiction but for the exclusive jurisdiction of the Energy Commission to certify sites and related facilities;

Response to Question 1:

The Watson Cogeneration Facility generates wastewater, which is discharged to the wastewater treatment system at the BP Carson Refinery and ultimately to the Sanitation Districts' sewerage system.

Question 2:

A determination of the completeness of the list in the AFC of the Laws, regulations, ordinances, or standards which your agency administers or enforces and would be applicable to the proposed site and related facilities but for the exclusive jurisdiction of the Energy Commission to certify sites and related facilities;

Response to Question 2:

The AFC Appendix "R" contains a current valid copy of the current Industrial Waste Discharge Permit for the BP Carson Refinery. Inclusive by reference are the following laws, regulations, ordinances, and standards:

- a) The Sanitation Districts "Wastewater Ordinance"
- b) The Sanitation Districts "Connection-Fee Ordinance"
- c) The Clean Water Act of 1977 (Pub. L. 95-217)
- d) The Water Quality Act of 1987 (Pub. L. 100-4)
- e) 40 CFR 403 – General Pretreatment Regulations

- f) 40 CFR 419E – Petroleum Refining – Integrated Subcategory
- g) 40 CFR 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants
- h) California Health and Safety Code – Definitions of Hazardous Wastes – Spill Containment
- i) RCRA – Definitions of Hazardous Wastes – Spill Containment

Question 3:

A description of the nature and scope of the requirements which the applicant would need to meet in order to satisfy the substantive requirements of your agency but for the Energy Commission's exclusive jurisdiction and Identification of any analysis that the Energy Commission should perform in order to determine whether these substantive requirements can be met.

Response to Question 3:

Watson Cogeneration Company would need to continue to have an agreement with the BP Carson refinery to accept their wastewater. The BP Carson refinery would need to continue to abide by all the requirements outlined in their Industrial Wastewater Discharge Permit to discharge wastewater to the Sanitation Districts. It is suggested that confirmation of a valid Industrial Waste Permit is the only additional analysis required.

Question 4:

An analysis of whether there is reasonable likelihood that the proposal will be able to comply with your agency's applicable Substantive requirements.

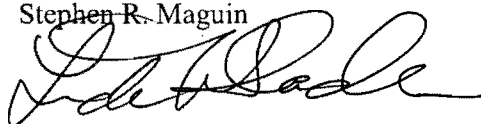
Response to Question 4:

There is a reasonable likelihood that the proposed discharge will be able to comply with the Sanitation Districts' applicable requirements.

If you have any questions, please feel free to contact Brent C. Perry, P.E. of the Sanitation Districts' Industrial Waste Section at (562) 908-4288, extension 2930.

Very truly yours,

Stephen R. Maguin



Linda M. Shadler
Supervising Civil Engineer
Industrial Waste Section

LMS:BP:tld